

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Erin Kelly

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ROBERT ANTHONY HAAS

CASE NUMBER:
UNDER SEAL**19CR 486****MAGISTRATE JUDGE KIM****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about May 11, 2019, at Ottawa and elsewhere, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18, United States Code, Section
115(a)(1)(B)

FILED

JUN 10 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Offense Description

By threatening to assault or murder a Federal law enforcement officer with intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

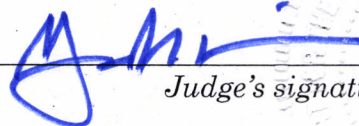


CHRISTOPHER POTTS
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: June 10, 2019

City and state: Chicago, Illinois



Judge's signature

YOUNG B. KIM, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SS

AFFIDAVIT

I, CHRISTOPHER POTTS, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed since September 2018. I currently serve on both the Joint Task Force on Gangs and the Joint Terrorism Task Force. My current responsibilities include the investigation of violent crimes, including, among others, narcotics violations, criminal enterprises, domestic terrorism, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that ROBERT ANTHONY HAAS has violated Title 18, United States Code, Section 115(a)(1)(B), by threatening to assault or murder a Federal law enforcement officer with the intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HAAS with a violation of Title 18, United States Code, Section 115(a)(1)(B), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge acquired through participation in this investigation, information provided to me by other law enforcement agents who have knowledge of the events and circumstances described herein, my training and experience, and my review of information provided by telephone service providers.

FACTS ESTABLISHING PROBABLE CAUSE

I. BACKGROUND OF THE INVESTIGATION

A. HAAS's Threats to Federal Official A on Instagram

4. On or about January 2, 2018, the U.S. Department of State commenced an investigation of Instagram posts that a person with the user name robert.haas.1023 had posted to a federal government official's public Instagram account page ("Federal Official A").¹ According to information that I received from the Department of State, the Instagram posts that robert.haas.1023 posted to Federal Official A's Instagram page included messages that stated, "Terrorist traitor whore. You are going to hang bitch. I promise you this," and "Your lies will not stop the truth. You're good as dead now. You should kill yourself because what humanity is going to do to you holocaust fakers is going to hurt bad bitch." Photographs of those Instagram messages are copied below:

¹ Instagram is a social networking site that allows its users to comment on photographs and content that is posted to Instagram's website.



robert.haas.1023 Terrorist traitor whore. You are going to hang bitch. I promise you this.

1h Reply



robert.haas.1023 Your lies will not stop the truth. You're good as dead now. You should kill yourself because what humanity is going to do to you holocaust fakers is going to hurt bad bitch.

5. According to information that I received from the Department of State, the person making the Instagram posts had registered the Instagram account using an e-mail address that was associated with HAAS. Through its investigation, the Department of State learned that HAAS resides in Ottawa, Illinois, and that his cellular phone number is 347-XXX-4034 (the "HAAS Phone").²

6. According to information that I received from the Department of State, on or about January 25, 2018, a member of the Department of State's Diplomatic Security Service ("Federal Official B") and other law enforcement officers met with HAAS at HAAS's residence in Ottawa, Illinois, to discuss HAAS's Instagram posts. Law enforcement asked that HAAS moderate the tone of his communications. During their meeting, Federal Official B left one of Federal Official B's business cards at HAAS's residence that included Federal Official B's work cellular phone number.

² Law enforcement interviewed HAAS's family members, who gave agents the cellular phone number for HAAS and told agents that HAAS resides in Ottawa, Illinois. As described in paragraph 6, below, on January 25, 2018, agents met with HAAS at his residence in Ottawa, Illinois. In addition, subscriber records state that the cellular phone number 347-XXX-4034 is subscribed to HAAS at an address in Ottawa, Illinois.

B. HAAS's Threats to Federal Official B

7. According to the Department of State, after meeting with HAAS, Federal Official B received text messages from a phone number that Federal Official B's caller ID identified as 347-XXX-4034, the cellular telephone number that is assigned to the HAAS Phone.

8. HAAS's text messages to Federal Official B include the following:

a. On or about December 30, 2018, at approximately 6:41 p.m., HAAS, using the HAAS Phone, sent Federal Official B a text message stating, among other things, "Don't litter your trash 'business card' at my house retard. You people are pathetic and stupid. I'm bringing humanity to get you." HAAS also stated, "Why don't you reply bitch terrorist. You created your own problem here. Now youre gonna pay whats due protecting terrorists. I would go hide in israel if i was you!!!"

Photographs of these text messages are copied below:

Fox News. 🤔😬😬
Fucking bitch terrorist
protecting maggot. Don't litter
your trash "business card" 🗑️
at my house retard. You people
are pathetic and stupid. I'm
bringing humanity to get you.
I'm considering handing out
talmud verses and these
israelis in WTC photos outside
your office.

Why dont you reply bitch
terrorist. You created your own
problem here. Now youre
gonna pay whats due
protecting terrorists. I would go
hide in israel if i was you!!!

b. On or about March 19, 2019, at approximately 12:46 p.m., HAAS, using the HAAS Phone, sent Federal Official B a text message stating, "Whoever, owing allegiance to the United States, levies war against them or adheres to their enemies, giving them aid and comfort within the United States or elsewhere, is guilty of treason and shall suffer death." A photograph of this text message is copied below:

Whoever, owing allegiance to
the United States, levies war
against them or adheres to
their enemies, giving them aid
and comfort within the United
States or elsewhere, is guilty of
treason and shall suffer death

c. On or about March 19, 2019, at approximately 12:46 p.m., HAAS, using the HAAS Phone, sent Federal Official B a text message stating, "If you knew how I felt in my heart about you fucking terrorists you would leave my country with your family." A photograph of this text message is copied below:

If you knew how I felt in my
heart about you fucking
terrorists you would leave my
country with your family

d. On or about March 27, 2019, at approximately 2:15 p.m., HAAS, using the HAAS Phone, sent Federal Official B a text message stating, "Don't forget what you bitch feds serve. I want to see you full of holes by a militia." A photograph of this text message is copied below:

Dont forget what you bitch feds
serve. I want to see you full of
holes by a militia.

II. HAAS's THREATS TO FEDERAL OFFICIAL C

A. Text Messages

9. On or about May 8, 2019, an FBI Task Force Officer ("Federal Official C"), called the HAAS Phone and spoke with an individual who identified himself as HAAS. Federal Official C told HAAS that he was a federal law enforcement officer and asked that HAAS meet with law enforcement personnel for an interview. Law enforcement intended to discuss with HAAS the text messages that HAAS had sent to Federal Official B.

10. That same day, Federal Official C and other law enforcement officers met with HAAS at HAAS's place of employment in Ottawa, Illinois. Federal Official C identified himself to HAAS as an FBI Task Force Officer and displayed his FBI credentials. Law enforcement told HAAS that there was a complaint that needed to be addressed. After the officers arrived, HAAS became angry and law enforcement left the premises.

11. After HAAS's May 8, 2019, meeting with law enforcement, Federal Official C received approximately 71 text messages from the HAAS Phone. HAAS texted Federal Official C's work cellular phone number, which is the same phone number that Federal Official C had used to call HAAS to arrange the May 8 meeting with law enforcement.

12. HAAS's text messages to Federal Official C include the following:

a. On or about on May 8, 2019, at approximately 7:27 p.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, "Take off the gun and badge like you said you would pussy. Come meet true evil. I got something for you terrorists." A photograph of this text message is copied below:

**Take off the gun
and badge like you
said you would
pussy. Come meet
true evil. 😏 I got
something for you
terrorists.**

MMS
7:27 PM


b. On or about May 8, 2019, at approximately 7:28 p.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, "The world must know what you promote/support. So they can eliminate you!" A photograph of this text message is copied below:

received from a text message
**The world must
know what you pro-
mote/support. So
they can eliminate
you!**

MMS
7:28 PM


c. On or about May 9, 2019, at approximately 12:48 a.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating,

“Hahahahaaaa. Because you know americans will kill you bitch ass jews. take heed pops.” A photograph of this text message is copied below:

 Hahahahaaaa.
Because you know
americans will kill
you bitch ass jews.
take heed pops

12:46 AM

d. On or about May 9, 2019, at approximately 10:37 a.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, “I thought you wanted to chat you monkey jew. You coward old man. You know I get what I want and I think you deserve death.” A photograph of this text message is copied below:

 I thought you
wanted to chat you
monkey jew. You
coward old man.
You know I get
what I want and I
think you deserve
death.

10:37 AM

e. On or about May 9, 2019, at approximately 10:51 a.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, “Any judge trying to prosecute me for the truth must die. That is treason and anti american. I will personally cut that ones throat!” A photograph of this text message is copied below:



Any judge trying to
prosecute me for
the truth must die.
That is treason and
anti american. I will
personally cut that
ones throat!

10:51 AM


f. On or about May 9, 2019, at approximately 11:04 a.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, "I'm not afraid to walk out my door in the morning. You should be however considering you support Jewish terrorism and your anti-American bullshit is going to get you killed." A photograph of this text message is copied below:

I'm not afraid to
walk out my door
in the morning. You
should be however
considering you
support Jewish
terrorism and your
anti-American
bullshit is going to
get you killed.

MMS
11:04 AM

g. On or about May 9, 2019, HAAS, at approximately 6:33 p.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, "Joe. You're a yiddish pollock. Not a semite. You paedophile jew maggot. Come try to stop

me and see what happens to you and yours. lolol.” A photograph of this text message is copied below:

 **Joe. You're a
yiddish polock.
Not a semite. You
paedophile jew
maggot. Come try
to stop me and see
what happens to
you and yours. lolol** 6:33 PM

h. On or about May 9, 2019, at approximately 6:36 p.m., HAAS, using the HAAS Phone, sent Federal Official C a text message stating, “Jews out bitch. Along with the terrorists who support paedo terrorists. They will pay the highest cost. Flesh reparations for treason from you shylocks. Pound of flesh pops.” A photograph of this text message is copied below:

**Jews out bitch.
Along with the ter-
rorists who support
paedo terrorists.
They will pay the
highest cost. Flesh
reparations for
treason from you
shylocks. Pound of
flesh pops.** 6:36 PM

B. Verbal Threat to Assault or Murder Federal Official C

13. On or about May 11, 2019, at approximately 9:52 p.m., HAAS left Federal Official C a voice mail message threatening to assault or murder Federal Official C by telling Federal Official C that he needed a bullet in his head:

Why is your phone off you baby dick-sucking kike. What if an American is in danger and needs your help. Fucking loser Jew-lover piece of shit. You are guilty of fucking treason and you need a bullet in your fucking head for it. Telling me you support Israel. Mother fucker. You support Americans bitch you better watch your fucking mouth boy.

Federal Official C's caller ID shows that Federal Official C received the voice mail message from telephone number 347-XXX-4034, the cellular telephone number that is assigned to the HAAS Phone.

14. Based on its investigation, law enforcement has identified HAAS as the person who left the May 11, 2019, voice mail message that threatened to assault or murder Federal Official C. Specifically, about three days before Federal Official C received the May 11, 2019, voice mail message, Federal Official C called HAAS at the telephone number 347-XXX-4034, spoke to an individual who identified himself as HAAS, and met with HAAS at HAAS's place of employment in Ottawa, Illinois. Based on Federal Official C's prior communications with HAAS, Federal Official C recognized the voice in the May 11, 2019, voice mail message as the voice of HAAS.

15. As set forth above, subscriber records for telephone number 347-XXX-4034 show that the telephone number is subscribed to HAAS at an address in Ottawa, Illinois. Subscriber records also show that a 42-second phone call was placed from 347-XXX-4034 to Federal Official C's work cellular telephone number on May 11,

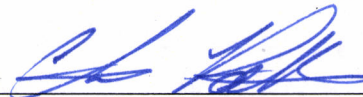
2019, at 9:51 p.m., the same approximate date and time that Federal Official C received the verbal threat.

16. Subscriber records reflect that, from May 8 to May 15, 2019, HAAS made, or attempted to make, approximately 195 phone calls from the HAAS Phone to Federal Official C's work cellular telephone number. HAAS left Federal Official C approximately seven voice mail messages. Federal Official C deleted the first two voice mail messages from HAAS but retained the last five voice mail messages. I have listened to the recordings of each of the five voice mail messages that Federal Official C has retained, including HAAS's May 11, 2019, voice mail message to Federal Official C that Federal Official C needed a bullet in his head. In my opinion, the caller's voice is the same in each phone call.

CONCLUSION

17. Based the information set forth above, I respectfully submit that there is probable cause to believe that, on or about May 11, 2019, ROBERT ANTHONY HAAS threatened to assault or murder a Federal law enforcement officer with the intent to impede, intimidate, or interfere with such law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such law enforcement officer on account of the performance of official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

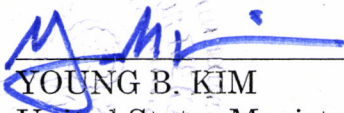
FURTHER AFFIANT SAYETH NOT.



CHRISTOPHER POTTS

Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on June 10, 2019.



YOUNG B. KIM

United States Magistrate Judge